



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 11, 2023

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Charles Briscoe, 23 Cr. 134 (VSB)**

Dear Judge Broderick:

As the Court is aware, the defendant in the above-captioned action has, since the time of his arrest, been at liberty on conditions set at the time of his presentment in the Southern District of Texas. The Government has conferred with defense counsel, and the parties have a bail package to jointly propose for the Court's consideration, as set forth below.

The parties propose that the defendant be released on a \$200,000 personal recognizance bond, to be co-signed by one financially responsible person, subject to the following conditions: (a) the defendant is to report to Pretrial Services as directed; (b) the defendant is to surrender all travel documents and make no new applications; (c) the defendant's travel is restricted to the Southern and Eastern Districts of New York and the Southern District of Texas, and points in between for travel to and from for court and attorney visits; (d) the defendant is also permitted to travel within the continental United States for work purposes only, with the prior approval of Pre-Trial Services, which is to be provided with all travel information in advance; (e) the defendant is to seek and maintain verifiable employment; (f) the defendant is not to have contact with co-defendants, victims and/or witnesses except in the presence of counsel; (g) the defendant is not to possess identifying information of others, with the exception of immediate family members; (h) the defendant is not to open any new financial accounts or lines of credit without prior approval from Pretrial Services; (i) the defendant is not to manage, take possession of, or possess funds belonging to any third party. The defendant can remain at liberty based on his signature on the new bond and be afforded one week to meet the remaining conditions.

The parties respectfully request that the Court enter an order setting forth the conditions of release above, in order to facilitate the entrance of the proposed bond.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: \_\_\_\_\_  
Katherine C. Reilly  
Kevin Mead  
Assistant United States Attorneys

cc: Ian Marcus Amelkin, Esq. (by email)